

## REMARKS

This application was originally filed on 31 December 2001 with forty claims, six of which were written in independent form. No claims have been allowed. Claims 5-7 and 27-29 have been canceled, and Claims 41-46 added by this amendment. Because there are still forty claims, six of which are written in independent form, it is believed fees other than extension of time fees are due as a result of this amendment. Please charge any necessary fees to the deposit account of Texas Instruments Incorporated, deposit account number 20-0668.

Claims 1-40 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention. The applicant has canceled Claims 5-7 and 27-29 as suggested by the Examiner to overcome this rejection.

Claims 1-40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,888,884 to Wojnarowski. The applicant respectfully disagrees.

Claims 1, 24, 27, 30, 33, and 37, all of the independent claims in the application, recite "removing said overcoat from said micromechanical devices." Wojnarowski does not show, teach, or suggest this limitation. The Examiner stated, "The insulating materials is subsequently removed (lines 29-36)." The applicant respectfully disagrees. The passage cited by the Examiner, column 8, lines 29-36 of Wojnarowski, teaches "openings 56 are formed in insulating layer 54 to provide access to top interconnection pads 40." Thus Wojnarowski merely teaches providing access to the underlying circuitry, not removing the overcoat.

The Examiner stated, "It is noted that the array can be a variety of structures including a micromechanical device (col. 1 lines 15-21)." The applicant respectfully submits the passage cited by the Examiner merely lists devices that "require precision placement of individual devices" (lines 19-20 of column 1) with which Wojnarowski's method of "electrical relocation of device top pads to the bottom of the device, as well as the placement of devices, particularly arrays of devices, in precise locations" is applicable. Wojnarowski does not show, teach, or suggest the methods of depositing and removing an overcoat on a micromechanical device as recited by the present claims.

Added Claims 41-46 recite overcoating or depositing "is sufficient to immobilize said

moveable element." Wojnarowski does not show, teach, or suggest this limitation.

In view of the amendments and the remarks presented herewith, it is believed that the claims currently in the application accord with the requirements of 35 U.S.C. § 112 and are allowable over the prior art of record. Therefore, it is urged that the pending claims are in condition for allowance. Reconsideration of the present application is respectfully requested.

Respectfully submitted,



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